

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KIMBERLY BEHZADI and JASON	:	
RINDENAU, on behalf of themselves and all	:	Case No.: 14-CV-4382 (LGS)
others similarly situated,	:	
	:	
Plaintiffs,	:	ECF Case
	:	
v.	:	
	:	
INTERNATIONAL CREATIVE	:	
MANAGEMENT PARTNERS, LLC,	:	
	:	
Defendant.	:	
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DECLARATION OF ADAM PHILLIPS

I, ADAM PHILLIPS, hereby declare and state the following true facts:

1. I am of legal age and competent to make this Declaration, and have personal knowledge of the facts set forth in this Declaration.
2. I was an intern at International Creative Management Partners LLC ("ICM") during the Summer of 2013 in the Television Literary Department of ICM's Los Angeles office. The Television Literary Department represents television writers and directors.
3. I attended the University of Southern California where I double majored in Business Administration and Critical Studies.
4. For a long time, I had wanted to work in the entertainment industry and, prior to interning with ICM, I interned with production companies and networks. However, I wanted to experience the agency side of the business. Therefore, when I learned about ICM's internship opportunities, I was interested in applying. My father reached out and passed along my resume to an agent at ICM whom he knew. Thereafter, I interviewed via Skype with Karen Abrams and an ICM agent.

5. I was then offered the opportunity to intern with ICM during the Summer of 2013. I was told that the internship was unpaid and that I would need to procure college credit.

6. During the summer of 2013, I enrolled in a summer class at the College of the Canyons and received academic credit through the College of the Canyons for my internship.

7. During my internship, I was primarily supervised by two department coordinators, Laura Gordon and Quincy Kevan. They were previously assistants at ICM, so they had intimate knowledge of the company, the department, the writers that ICM represents, and the projects that ICM was staffing with writers.

8. I was also given client scripts, along with a book of available actors/actresses. I was asked to read the scripts and think about actors/actresses who would be good fits for the roles. I was also asked to assess the scripts and how they should be packaged for development. I would then meet with the coordinators, assistants or agents, who had also read the scripts, and we would discuss the scripts and the assessments that I had made. In turn, the coordinators, assistants or agents would provide me with valuable feedback regarding how to phrase criticism when evaluating a script and how to decide which networks would be a good fit for the particular script.

9. During my internship, I was able to shadow assistants and observe them doing their day-to-day work. I also had the opportunity to sit in on a development meeting with a major network, which I found to be a very interesting experience.

10. I met a few agents at the weekly summer lunches. I also met with an agent in the Feature Literary Department and a coordinator in the International and Independent Motion Picture Department. I was able to ask these individuals about the industry and their career paths.

11. As a result of my internship, I learned an incredible amount about television, the types of projects that are sold, and the way packages and shows come together. The internship was a hands-on experience and I learned more than I would have in an educational setting. You cannot learn the agency side of the business through a textbook; you have to be in the thick of it.

12. Currently, I am employed with ICM as an Assistant in the Television Literary Department. My job is very different from my internship experience. As an Assistant, my responsibilities include handling the agent's schedule and his clients, tracking money, and assisting with contracts.

13. This past summer I had the opportunity to work with interns. I tried to replicate for them the projects that I felt were worthwhile to me when I was an intern. For example, I provided the interns client scripts to read and draft coverage. I or my boss (the agent who I assist) would then provide the interns with feedback.

14. At an agency, we are inundated with work and it takes some time out of your day to assign projects to interns, to review their projects upon completion, and to provide them with feedback. Interns do not alleviate my workload.

Voluntariness of Statement

15. My participation in the interview during which the information for this statement was gathered, on September 8, 2014, and my decision to sign this statement, on the date indicated below, were both completely voluntary.

16. I understand that the attorneys with whom I spoke represent ICM, and do not represent me individually.

17. Before I provided the information for this statement during an interview with an attorney for ICM, certain information was communicated clearly to me, including that: my

participation in the interview was completely voluntary; no adverse employment consequence would result and I would not be retaliated against in any way if I declined to participate; I would not receive any positive employment consequence or other benefit by participating; the interview was part of a fact gathering process to aid ICM in preparing its defense of the litigation; the information learned during the interview might be used in the litigation; the individuals who had commenced the litigation were attempting to represent a class of all former ICM interns; and because I am a member of the group that could join in the lawsuit against ICM, my interests could be adverse to those of ICM.

18. I was also asked if I was represented by counsel (I am not); I was informed that I could decide to stop the interview at any time if I changed my mind and no longer wished to participate; and I was instructed that I had the right to retain my own attorney before deciding to participate in the interview.

19. After hearing and understanding the above information, I made a voluntary decision to participate and to provide the information for this statement.

20. In addition, before signing below, I reviewed the contents of this statement to make sure it was completely accurate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: September 16, 2014
Los Angeles, California


ADAM PHILLIPS